



"Building A Stronger Community
TOGETHER"

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Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW Washington, DC 20554

RE: WT Docket 05-196

Shelton Communications (SHELCOM) is the primary Public Safety Answering Point (PSAP) in Mason County, WA. We answer 9-1-1 calls for a population of over 51,500 and dispatch police, fire and paramedic services to citizens in crisis.

We support the FCC's ruling to require interconnected VoIP providers to ensure they are able to deliver accurate location and call back information to the PSAP when their customer calls 9-1-1.

We routinely encounter citizens who are unable to provide us with an adequate description of their location. Many times people lose focus during a crisis and are not able to recall simple details such as their address. We anticipate that the same phenomenon will keep callers from choosing the phone with adequate 9-1-1 capabilities when they encounter a crisis and have more than one phone in their home. There is also potential for citizens in crisis to be restricted to an area where they cannot access the phone with adequate 9-1-1 capabilities, such as during an abduction, home invasion or domestic violence situation. The VoIP providers fail to understand that the vast majority of citizens have an expectation that a functioning telephone will reach 9-1-1 in an emergency.

We ask that the Commission not extend the 120 day deadline for interconnected VoIP providers to provide enhanced 9-1-1 services to their customers as they were very aware of this problem and failed to act prior to saturating the market with these devices. Please ensure that any requirements imposed on VoIP providers does not cause undue burden on a PSAP's ability to process and dispatch an emergency response to a 9-1-1 call. Finally, please ensure that the Commission's rules take in to consideration the operational requirements of the current PSAP infrastructure and not impose rules that will require considerable upgrades or replacement of PSAP equipment.

Sincerely,

Mike Akin, Communications, Shelton Police Department

cc: APCO International Office of Legislative Affairs

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